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25 CORPORATION, TATA CONSULTANCY  
26 SERVICES, LTD. and TATA SONS, LTD.

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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
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19 GOPI VEDACHALAM and KANGANA ) Case No. CV 0963 (VRW)  
20 BERI, on behalf of themselves and all )  
21 others similarly situated, )  
22 Plaintiffs, )  
23 v. )  
24 TATA AMERICA INTERNATIONAL )  
25 CORPORATION, a New York )  
corporation; TATA CONSULTANCY )  
SERVICES, LTD., an Indian corporation; )  
and TATA SONS, LTD., an Indian )  
corporation, )  
26 Defendants. )  
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**STIPULATION AND ORDER FOR  
CONTINUANCE OF INITIAL CASE  
MANAGEMENT CONFERENCE AND  
FILING OF JOINT CASE  
MANAGEMENT STATEMENT**

**[N.D. Local Rules 6-2 and 7-12]**

[Declaration of Michelle M. La Mar filed  
concurrently herewith]

1 Pursuant to this Court's Civil Local Rules 6-2 and 7-12, plaintiffs Gopi Vedachalam  
2 and Kangana Beri ("Plaintiffs"), and defendants Tata America International Corporation,  
3 Tata Consultancy Services, Ltd. and Tata Sons, Ltd. ("Defendants"), (collectively, the  
4 "Parties") by and amongst themselves, hereby stipulate as follows:

5 1. On March 13, 2007, in conjunction with the Court's ruling on Defendants'  
6 Motion to Compel Arbitration, the Court set the Case Management Conference ("CMC")  
7 in this matter for March 27, 2007 and ordered the Parties' Joint Case Management  
8 Statement to be filed on March 20, 2007.

9 2. Due to a pre-existing scheduling conflict, Plaintiffs' counsel is unavailable  
10 for the CMC date currently set by this Court.

11 3. Accordingly, the Parties agree to adjourn the date for the CMC to April 3,  
12 2007 or to the Court's next available CMC date.

13 4. The Parties further agree to extend the date for filing the Joint Case  
14 Management Statement until March 27, 2007 or seven days before the rescheduled CMC  
15 should a date other than April 3, 2007 be set by this Court.

16 5. Nothing contained in this Stipulation is intended to waive prejudice or alter  
17 Defendants' right to seek an additional adjournment of the CMC based upon the filing of a

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1 Motion to Dismiss or on other grounds.

2 Dated: March 16, 2007

LOEB & LOEB LLP

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By: /s/ Michelle M. La Mar

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Michelle M. La Mar  
Attorneys for all Defendants

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Dated: March 16, 2007

KELLEY DRYE & WARREN LLP

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By: /s/ Kevin J. Smith

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Kevin J. Smith  
Attorneys for all Defendants

12

Dated: March 16, 2007

LEIFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP

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By: /s/ Kelly M. Dermody

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Dated: March 16, 2007

RUKIN HYLAND DORIA &  
TINDALL LLP

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By: /s/ Steven M. Tindall

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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Dated: March 19, 2007



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Judge, United States District Court

**Signature Attestation:**

I, Michelle M. La Mar, hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this efiled document.

/s/ Michelle M. La Mar  
Michelle M. La Mar